

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Rules Governing Ultra-)	RM-11844
Wideband Devices and Systems)	
)	

MOTION FOR EXTENSION OF TIME TO FILE COMMENTS

Pursuant to Section 1.46 of the Commission’s Rules, 47 C.F.R. § 1.46, the GPS Innovation Alliance (“GPSIA”), by its undersigned representative, hereby respectfully requests an extension of the time for filing comments and reply comments on the petition for rulemaking filed by Robert Bosch LLC¹ as set forth in the Commission’s Public Notice released on July 18, 2019.² Good cause exists for the Commission to modify the Public Notice’s pleading deadlines, and granting the requested extension of time will not cause prejudice or hardship to any interested party or to the Commission.

GPSIA recognizes that the Commission does not routinely grant extensions of time,³ but in this case there is ample good cause to depart from general policy. The Bosch Petition is at once both sweeping and specific. The Petition calls for a comprehensive review of the Commission’s ultra-wideband (“UWB”) rules, a settled regulatory framework which has been in place for nearly seventeen years. At the same time, the Petition also seeks changes in specific

¹ *In the Matter of Amendment of Rules Governing Ultra-Wideband Devices and Systems*, Petition for Rulemaking of Robert Bosch LLC (filed June 18, 2019) (“Bosch Petition” or “Petition”).

² See Public Notice, *Consumer & Governmental Affairs Bureau Reference Information Center Petitions for Rulemakings Filed*, Report No. 3130, RM-11844 (rel. July 18, 2019). Currently, comments related to the petition are due on August 19, 2019, and reply comments are due on September 3, 2019.

³ See 47 C.F.R. § 1.46(a).

UWB rules. Among other things, the Petition seeks revisions to the minimum bandwidth rules,⁴ changes to the definition of imaging systems,⁵ allowances for outdoor operation of UWB transmitters,⁶ and eligibility expansions to allow UWB devices for operation of toys and ground-based vehicles (*i.e.*, trains, ships, and construction vehicles).⁷ The Petition cites multiple individual waivers and draws heavily from foreign (European) legal regimes as justification for FCC action. The Petition seeks to upend rules that were established after a careful, lengthy, and painstaking process, including joint government-multistakeholder testing, to assess the risk of interference. GPSIA and its members have a deep interest in the outcome of this inquiry.⁸

In its current form, the Bosch Petition presents numerous complex questions that will take some time to consider even at this early stage of the regulatory process and which cannot be constructively addressed under the current timeframe. While the Petition requests a comprehensive review of the UWB rules, it does not provide specific guidance on the intended scope of the requested inquiry. Furthermore, while Petitioners seek to change numerous definitions to expand eligibility under the UWB rules, the Petition does not effectively address

⁴ *Id.*, pp. 26-33.

⁵ *Id.*, pp. 33-34.

⁶ *Id.*, p. 41.

⁷ *Id.* There are also many other proposed UWB reforms in the Petition, including expansions of the definition of surveillance systems (pp. 34-35); authorization for UWB motion and presence detection applications (p. 35); changes to the scope of what constitute GPRs, wall imaging systems, and through-wall imaging systems (p. 38); new allowances for consumer surveillance and security systems (p. 40); and new operational methods for hand-held UWB systems (p. 41).

⁸ In developing the existing UWB rules, the Commission recognized that the wide bandwidth intrinsic to the operation of UWB devices could result in transmission of intentional emissions into restricted frequency bands used for safety of life purposes, such as the GPS bands. *See Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems*, Notice of Proposed Rulemaking, 65 Fed. Reg. 37332 (2000), ¶ 29.

the numerous changes to technical, operational, and service rules that would be required to implement such changes. Much of the Petition rests on a desire to model off European UWB rules with an eye to domestic expansions and international harmonization.² GPSIA and its members will need more time to analyze the ETSI rules as compared with the present domestic regime and to consider its input on this issue.

While Petitioner has had ample time to develop its proposal, GPSIA has had only a brief time to consider the implications of the requested FCC action. The public interest would not be served if interested parties do not have sufficient time to evaluate the merits of the Petition and to provide input that, should the Commission decide to proceed with a Notice of Proposed Rulemaking, would help shape the contours of any subsequent rulemaking proceeding.

Further, the timing of the Petition's comment cycle contributes to the burdens associated with responding. The comment period falls in late July and early August – a customary summer vacation and travel period -- which makes it exceedingly difficult for GPSIA members to convene the appropriate technical and other teams to consider and prepare a constructive contribution to the record.

GPSIA believes it is important that the Commission provide stakeholders with ample time and opportunity to constructively articulate their views and recommendations from the outset. GPSIA notes that neither the Commission nor any other party will be unduly burdened by granting additional time to respond to the Petition. Given the complexity of the issues raised, the important interests at stake, and summer travel schedules, a thirty day extension is justified and will not unduly delay the progression of this proceeding. Accordingly, GPSIA urges the

² Bosch Petition, pp. 5-6.

Commission to extend the filing deadlines for Comments and Replies in this proceeding to September 18, 2019, and October 3, 2019, respectively.

Respectfully Submitted,

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